

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO**

IN RE: POLYURETHANE FOAM ANTITRUST
LITIGATION

This document relates to:

INDIRECT PURCHASER CLASS CASES

MDL Docket No. 2196

Index No. 10-MD-2196(JZ)

Hon. Jack Zouhary

**STIPULATION FOR DISMISSAL, WITHOUT PREJUDICE, OF THE
PLAINTIFFS' CLAIMS AGAINST DEFENDANTS DOMFOAM AND VALLE FOAM**

In accordance with Rule 41 of the Federal Rules of Civil Procedure, Indirect Purchaser Class Action Plaintiffs, individually and on behalf of an alleged class of entities that purchased Polyurethane Foam ("Plaintiffs"), and Defendants Domfoam International Inc. ("Domfoam") and Valle Foam Industries (1995) Inc. ("Valle Foam") stipulate and agree to the dismissal, without prejudice, of the Plaintiffs' claims against Defendants Domfoam and Valle Foam with each side bearing their own attorneys' fees and costs. The Plaintiffs and Defendants Domfoam and Valle Foam further stipulate and agree to this Court's continuing jurisdiction for purposes of enforcing the settlement dated January 3, 2012 and granted preliminary approval by order dated March 26, 2012, between the Plaintiffs and Defendants Domfoam and Valle Foam. This Stipulation of dismissal, without prejudice, is intended to be without prejudice to the Plaintiffs' claims against any other Defendants or co-conspirators in the above-captioned case. A proposed Order of dismissal, without prejudice, accompanies this Stipulation as Exhibit 1.

Dated: March 28, 2012

Respectfully submitted,

PLAINTIFFS' INTERIM LEAD COUNSEL, on behalf of Class Plaintiffs individually and on behalf of the Class

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IT IS SO ORDERED

s/Jack Zhouhary

3/30/2012